



November 7, 2000

The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

RE: Revised Applications for Battelle Columbus Operations (BCO) –  
King Avenue and West Jefferson

Dear Sir or Madam:

Enclosed please find the revised National Environmental Achievement Track application forms for both the Battelle Columbus Operations (BCO) – King Avenue and West Jefferson facilities. Please note that the Environmental Requirements Checklist has also been included for both facilities although no changes were made to these forms.

The revisions to Section C on both applications were requested by John Chamberlain of the USEPA and consist of the following changes:

- Section C (1) – First Aspect

*Revised the “current level” quantities.*

- Section C (1) – Second Aspect

*Revised the “previous level” and “current level” quantities. Revised the statements in part (i) to reflect the above quantity changes.*

- Section C (2) – First Aspect

*Revised the quantities for parts (c) and (d).*

- Section C (2) – Second Aspect

*Revised the quantities for parts (c) and (d).*

- Section C (2) – Third Aspect

*Revised the quantities in part (a). Revised the quantities for parts (c) and (d).*

- Section C (2) – Fourth Aspect

*Revised the quantities for parts (c) and (d).*

While BCO – King Avenue and BCO – West Jefferson are two separate facilities, they are in fact managed as one unit. In addition, the majority of Environmental, Safety, and Health initiatives for both locations are also managed and tracked as one unit. Because of this, the previously reported quantities reflected the combined totals for both sites. The changes listed above now represent quantities that are facility specific to BCO – King Avenue and BCO – West Jefferson.

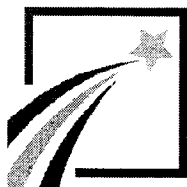
Please contact me with any additional questions or concerns at (614) 424-5706 or [hoberg@battelle.org](mailto:hoberg@battelle.org).

Sincerely,



Alan P. Hoberg  
Manager, Environmental and Quality Programs

APH:jjd  
Enclosure



***National  
Environmental  
Achievement Track***

***Application Form***

Battelle Columbus Operations - West Jefferson

Name of facility

Battelle Memorial Institute

Name of parent company (if any)

12345 St. Rt. 142

Street address

Street address (continued)

West Jefferson, Ohio 43162

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

Name Alan Hoberg

Title Manager, Environmental and Quality Programs

Phone (614) 424-5706

Fax (614) 424-5706

E-mail hoberg@battelle.org

***Why do we need this information?***

EPA needs background information on your facility to evaluate your application.

***What do you need to do?***

- Provide background information on your facility
- Identify your environmental requirements.

# Section A

*Tell us about your facility.*

**1 What do you do or make at your facility?**

Battelle serves industry and government in the generation, application, and commercialization of technology. With a wide range of scientific and technical capabilities, Battelle provides an added dimension to the research, management, and commercialization activities of clients in the United States and in several foreign countries. Battelle's services include research - conceptual, problem solving, product and process development, onsite technical assistance to clients, and management of programs with high technical content. These services are provided in a variety of areas, such as environmental sciences, electronics, advanced materials, defense systems, manufacturing and engineering, information systems, and others.

Battelle's West Jefferson facility consists of approximately 1200 acres encompassing three unique research and development areas, North, Middle, and South, with a staff of 200 scientists, engineers, technicians, and support personnel.

**2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.**

SIC  
8731

NAICS

**3 Does your company meet the Small Business Administration definition of a small business for your sector?**

☐ Yes ☒ No

**4 How many employees (full-time equivalents) currently work at your facility?**

☐ Fewer than 50  
☐ 50-99  
☒ 100-499  
☐ 500-1,000

☐ More than 1,000

## Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

OHT400013892

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Battelle Columbus Operations (BCO) has received the USEPA's WasteWise Program Champion award for three consecutive years (1998 - 2000). BCO has also been the recipient of the White Glove Award sponsored by Keep Franklin County Beautiful, Inc. and the Solid Waste Authority of Central Ohio (SWACO) for both 1998 and 1999. In April of 1999, BCO also received the Take Pride, Ohio! - Keep Ohio Beautiful - Business/Industry award for our efforts in recycling and waste management.

BCO has also been a Partner Member in the American Chemistry Council's Responsible Care initiative since 1996.

***Why do we need this information?***

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

***What do you need to do?***

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

# Section B

*Tell us about your EMS.*

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

Modified CEMP

☐ Third-party assessment

☐ ISO 14001 Certification

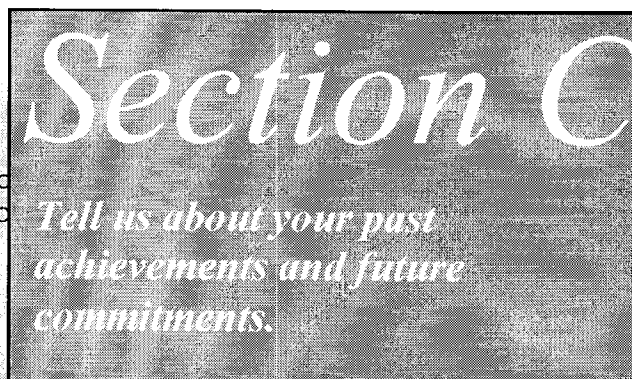
☐ Other

### ***Why do we need this information?***

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

### ***What do you need to do?***

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.



- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

### ***First aspect you've selected***

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Waste/Recycling	0	tons	0.5	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>In 1999, BCO began a new initiative to recycle plastic (#1 and #2) and glass (colored and clear) along with previously recycled aluminum cans. Previously both plastic and glass were disposed of as solid waste and not separated for recycling.</p> <p>ii. How did you achieve this improvement?</p> <p>BCO researched several different vendors and finally found a refuse hauler that would accept mixed plastic, glass, steel, and aluminum at an economically viable price. New recycling bins were purchased and distributed throughout the facility along with an employee awareness campaign to promote the improved recycling program. This improvement was in part the result of BCO's participation in the USEPA's WasteWise program.</p>				



## Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Solid Waste/Recycling	0.2	tons	1.1	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>Mixed paper recycling at BCO has increased by 0.9 tons over the past 2 years.</p>				
<p>ii. How did you achieve this improvement?</p> <p>In 1999, BCO expanded its paper recycling program to include several new types of paper. 1,300 plastic desk-side recycling bins were purchased in order to inform and encourage staff members to participate in a now simpler paper recycling program. In the past, staff members were required to sort their paper into several different categories according to type. The new program allowed staff to place all types of paper into one desk-side recycling container. Employee education on the value of recycling was accomplished through environmental fairs, a BCO intranet website, and environmental newsletters. This improvement in part was the result of BCO's participation in the USEPA's WasteWise program.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

## First aspect you've selected

- a. What is the aspect?
- Solid Waste - 20% reduction in solid waste generation at BCO based on 1999 as the baseline year.
- b. Is this aspect identified as significant in your EMS?
- ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 127 tons (Quantity/Units)
- ☐ Option B: In terms of

- |   |  |                              |
|---|--|------------------------------|
|   | In terms of<br>units of production<br>or output  | (Quantity/Units)             |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:<br>Absolute value  | 102 tons<br>(Quantity/Units) |
|   | <input type="checkbox"/> Option B:<br>In terms of<br>units of production<br>or output  | (Quantity/Units)             |
| e. How will you achieve this improvement?   | Continued employee education on the principles of the "Reduce, Reuse, and Recycle" waste hierarchy. Conduct Pollution Prevention Opportunity Assessments primarily focused on waste generation and waste minimization. |                              |

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### **Second aspect you've selected**

- |   |   |                             |
|---|---|-----------------------------|
| a. What is the aspect?  | Solid Waste - Increase the amount of recycled materials by 100 %.   |                             |
| b. Is this aspect identified as significant in your EMS?  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No   |                             |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.   | <input checked="" type="checkbox"/> Option A:<br>Absolute value   | 27 tons<br>(Quantity/Units) |
|   | <input type="checkbox"/> Option B:<br>In terms of<br>units of production<br>or output   | (Quantity/Units)            |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:<br>Absolute value   | 54 tons<br>(Quantity/Units) |
|   | <input type="checkbox"/> Option B:<br>In terms of<br>units of production<br>or output   | (Quantity/Units)            |
| e. How will you achieve this improvement?   | Continued employee education on the importance of recycling. Continued improvement of our recycling programs (i.e. simplifying existing programs, adding new materials to be recycled, etc.). |                             |

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### **Third aspect you've selected**

- a. What is the aspect? Materials Use - Increase the amount of purchased recycled-content products by 4 tons.
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 0.8 tons (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: Absolute value 4.8 tons (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement? Continued employee education on the importance of purchasing products with recycled-content. Identification of existing purchased materials that can be now be purchased with recycled-content.

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### **Fourth aspect you've selected**

- a. What is the aspect? Material Use - Increase BCO's sharing/re-use of chemicals by 25%.
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 400 lbs (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 500 lbs (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Continued employee education on the importance of re-using chemicals within the various research groups at BCO. Continued research and review on ways to improve the existing chemical re-use systems.

***Why do we need this information?***

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

# Section D

*Tell us about your public outreach and reporting.*

***What do you need to do?***

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

The Battelle Vice-President of Corporate Communications and other company officials meet with neighborhood leaders and city officials quarterly to discuss new projects as well as items of concern to neighbors. Prior to major activities, calls are placed to key community leaders.

2 How do you inform community members of important matters that affect them?

The Battelle Vice-President of Corporate Communications and other company officials meet with neighborhood leaders and city officials quarterly to discuss new projects as well as items of concern to neighbors. When events or plans of key interest to neighbors occur, they are involved in the planning. Prior to major activities, calls are placed to community leaders.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website [www.battelle.org](http://www.battelle.org)

☐ Newspaper

☐ Open Houses

☐ Other

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
<i>Representative of a Community/ Citizen Group</i>	Darby Partners Nature Conservatory	Terri Devlin	(614) 717-2770
<i>State/Local Regulator</i>	Ohio EPA, Central District Office, Division of Hazardous Waste Management	Hilary Solomon	(614) 728-3778
<i>Other community/local reference</i>	Madison County LEPC	Paul VanHorne	(740)852-4297

# Section E

## Application and Participation Statement.

On behalf of BCO - West Jefferson  
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Frank Hood 07/14/00

Printed Name/Title Frank Hood, BCO Vice-President for Environmental, Safety, Health, & Quality

Facility Name Battelle Columbus Operations - West Jefferson

Facility Street Address 12345 St Rt 142, West Jefferson, Ohio 43162

Facility ID Numbers OHT400013892

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail [ptrack@indecon.com](mailto:ptrack@indecon.com). Mail completed applications to:

The Performance Track Information Center  
c/o Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140



## National Environmental Achievement Track

### *Environmental Requirements Checklist*

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

**Facility Name** Battelle Columbus Operations - West Jefferson  
**Facility Location:** 12345 St Rt 142, West Jefferson, Ohio 43162  
**Facility ID Number(s):** OHT400013892  
*(attach additional sheets if necessary)*

#### **Air Pollution Regulations**

Check All  
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
2. Permits and Registration of Air Pollution Sources
3. General Emission Standards, Prohibitions and Restrictions
4. Control of Incinerators
5. Process Industry Emission Standards
6. Control of Fuel Burning Equipment
7. Control of VOCs
8. Sampling, Testing and Reporting
9. Visible Emissions Standards
10. Control of Fugitive Dust
11. Toxic Air Pollutants Control
12. Vehicle Emissions Inspections and Testing

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

**Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)**

- |     |                          |
|-----|--------------------------|
| 13. | <input type="checkbox"/> |
| 14. | <input type="checkbox"/> |

#### **Hazardous Waste Management Regulations**

1. Identification and Listing of Hazardous Waste (40 CFR 261)
  - Characteristic Waste
  - Listed Waste
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
  - Manifesting

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
  - Transfer facility requirements ☐
  - Manifest system and record-keeping ☐
  - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
  - General facility standards ☒
  - Preparedness and prevention ☒
  - Contingency plan and emergency procedures ☒
  - Manifest system, Record keeping and reporting ☐
  - Groundwater protection ☐
  - Financial requirements ☐
  - Use and management of containers ☒
  - Tanks ☐
  - Waste piles ☐
  - Land treatment ☐
  - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

**Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)**

- 8. ☐
- 9. ☐

**Hazardous Materials Management**

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☒
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

**Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)**

- 6. ☐
- 7. ☐

**Solid Waste Management**

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☐

4. Solid Waste Storage and Removal Requirements ☒
5. Disposal Requirements for Special Wastes ☒

**Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)**

6. ☐
7. ☐

**Water Pollution Control Requirements**

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☒
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☒
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☒
14. Collection, Handling, Processing of Sewage Sludge ☒
15. Oil Discharge Containment, Control and Cleanup ☐
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

**Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)**

17. ☐
18. ☐

**Drinking Water Regulations**

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☒
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☒
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

**Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)**

7. ☐  
8. ☐

**Toxic Substances**

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐  
2. Import and Export of Chemicals (40 CFR 707) ☐  
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐  
4. Chemical Information Rules (40 CFR 712) ☐  
5. Health and Safety Data Reporting (40 CFR 716) ☐  
6. Pre-Manufacture Notifications (40 CFR 720) ☐  
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☒  
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☒  
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☒

**Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)**

10. ☐  
11. ☐

**Pesticide Regulations**

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐  
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐  
3. Certification of Pesticide Applications (40 CFR 171) ☐  
4. Pesticide Licensing Requirements ☐  
5. Labeling of Pesticides ☐  
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐  
7. Disposal of Pesticide Containers ☐  
8. Restricted Use and Prohibited Pesticides ☐

**Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)**

9. ☐  
10. ☐

**Environmental Clean-Up, Restoration, Corrective Action**

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐  
☐

2. RCRA Corrective Action (identify)

☐  
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,  
Corrective Action Regulations Not Listed Above (identify)**

3.  
4.

☐  
☐